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RONNIE MORTON - PLAINTIFF

1221 RACE STREET

Philadelphia, PA 19107

(215) 454-9111

Mitchell H. Cohen Building & US Courthouse

4th & COOPER STREETS

CAMDEN, NEW JERSEY 08101

RECEIVED

JAN 2 2018

AT 8:30 M
WILLIAM T. WALSH, CLERK

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JAN - 2 2019

AT 8:30 M
WILLIAM T. WALSH, CLERK

RE: MORTON V. MOLZ

Civil Action No. 17-1799

U.S. MAGISTRATE JUDGE KAREN WILLIAMS,

PLEASE ACCEPT this letter in a more formal
motion to DENY PLAINTIFF Motion to Withdraw.
BASED on the following facts.

PLAINTIFF WROTE to PLAINTIFF ATTORNEY AFTER
PLAINTIFF DEPOSITION on 12-14-2018 AT DEFENDANT
LAW OFFICE, PLAINTIFF ADVISED PLAINTIFF ATTORNEY
THAT he would ACCEPT A SETTLEMENT in the
AMOUNT of \$200,000 FROM DEFENDANT if NOT
PLAINTIFF SEEKS PLAINTIFF ATTORNEY TO EXERCISE
PLAINTIFF RIGHTS AND PURSUE PLAINTIFFS CIVIL
CLAIMS AGAINST DEFENDANT in A TRIAL by JURY
PLAINTIFF ATTORNEY CALLED PLAINTIFF on 12-18-2018
ADVISING PLAINTIFF to BE MORE REALISTIC in
ACCEPTING A SETTLEMENT in the RANGE of \$10,000
DUE to DEFENDANT HAS NO LEGAL MALPRACTICE

(2)

INSURANCE AND THAT PLAINTIFF ATTORNEY WAS WITHDRAWING AND IF I AGREED TO ACCEPT A \$10,000 SETTLEMENT PLAINTIFF ATTORNEY WOULD CONSIDER RECONSIDERING TO WITHDRAW AS PLAINTIFF ATTORNEY I ADVISED PLAINTIFF ATTORNEY I WOULD ACCEPT A \$10,000 SETTLEMENT. ON 12-28-2018 PLAINTIFF ATTORNEY SENT ME A COPY OF ITS MOTION TO WITHDRAW WHICH IS WITHOUT MERIT AND HIGHLY PREJUDICIAL TO PLAINTIFF AND NEEDS TO BE DENIED BASED ON THESE FACTS, PLAINTIFF DID NOT VIOLATE ANY OF THE STIPULATIONS IN RPC 1.16 OR FRCP 74 AND 102.1 IN ADDITION SEE TERRY McDANIEL V. DAIICHI SANKO, INC. (CIVIL ACTION NO. 17-3495) AND SEE RUSINOW V. KAMARA, 920 F. Supp. 69, 71 (D.N.J. 1996), IN DECIDING WHETHER TO PERMIT AN ATTORNEY TO WITHDRAW, THE COURT SHOULD CONSIDER: (1) THE REASONS WHY WITHDRAWAL IS SOUGHT; (2) THE PREJUDICE WITHDRAWAL MAY CAUSE TO OTHER LITIGANTS; (3) THE HARM WITHDRAWAL MAY OR MIGHT CAUSE TO THE ADMINISTRATION OF JUSTICE; AND (4) THE DEGREE TO WHICH WITHDRAWAL WILL DELAY THE RESOLUTION OF THE CASE." SEE RPC 1.16(b)(1) AT THIS LATE JUNCTURE IN PLAINTIFF CASE (PRE TRIAL STAGE) IS EXTREMELY PREJUDICIAL

3.)

to Plaintiff, AND Plaintiff has did nothing MORE but Follow the Rules of this Court AND his Plaintiff Attorney Advise, Plaintiff HAS "NO" FINACIAL MEANS to obtain NEW COUNSEL AT this EXTREMELY LATE PHASE OF Plaintiff Civil CAUSE OF Action AND Plaintiff is "NOT" EXPERIENCED to litigate Plaintiff CLAIMS PRO SE AND given these FACTS Plaintiff REQUEST this Honorable Court to DENY Plaintiff Attorney Motion to Withdraw.

Respectfully Submitted
Rannie Mortore
Plaintiff

cc MATTHEW WEISBERG, ESQ
cc MARK J. MOLZ, ESQ

RONNIE MORTON - PLAINTIFF
1221 RACE STREET
PHILADELPHIA, PA. 19107

~~RECEIVED~~

90 CIVIL COURT CLERK
MITCHELL H. COHEN

RECEIVED

US COURT HOUSE
AT 8:30
WILLIAM T. WALSH CLERK

4TH & COOPER STREET
CAMDEN, N.J.

OFFICE 157

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AT 8:30
WILLIAM T. WALSH CLERK

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